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July 24, 2024

Planning and Housing Committee
City of Toronto
Toronto City Hall
100 Queen St W
Toronto, ON M5H 2N2

RE: PH14.7 - Single Exit Stair: Ontario Building Code Feasibility Study

Dear Chair Perks and Members of the Planning and Housing Committee,

I am writing to you on behalf of CLIP Homes, a Toronto-based vertically integrated design-build company specializing in prefabricated panelized construction of missing middle housing across Ontario. As proponents of innovative and sustainable housing solutions, we wish to express our strong interest and support of (1) single means of egress for buildings up to six storeys with an expediated alternative solution approvals process, and (2) changes to the National Building Code of Canada (NBC) and the Ontario Building Code (OBC) to permit single means of egress in multi-residential buildings up to six storeys.

Current building codes, which mandate two means of egress for most residential buildings, do not adequately address the unique spatial and operational needs of missing middle housing. This form of housing, which includes low-rise apartment buildings, townhouses, and multiplexes, is essential for bridging the gap between single-family homes and high-rise apartments, opening new attainable housing options for consumers. However, the stringent egress requirements present significant design and functional challenges, particularly in urban infill and major street projects.

Firstly, the lots suitable for missing middle housing are narrower and more constrained compared to those suitable for high-rise developments. Major streets and infill lots, where missing middle housing is most feasible, typically lack the expansive space necessary for extensive internal circulation. This spatial constraint complicates building design, leading to inefficient use of space and potentially confusing egress routes for occupants during emergencies. Simplifying egress requirements would facilitate more practical and safer designs for these housing types.

Secondly, missing middle projects typically have far fewer units than high-rise buildings. For example, a missing middle development might have 60 units or less, while a high-rise could have 300 or more. Despite this significant difference in scale and occupancy, both types are subject to the same two-means of egress requirements. This discrepancy highlights a fundamental misalignment in the building codes, which do not account for the varied scales and specific needs of different housing types. Adjusting egress requirements for smaller buildings would create a more equitable and rational regulatory environment, better suited to the realities of diverse housing forms.

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Additionally, the safety advancements in building materials across North America, fire suppression systems, and early warning technologies have greatly improved over the years. These innovations provide a robust safety net, making it feasible to reduce the egress requirements without compromising occupant safety. Modern construction techniques and materials offer enhanced fire resistance and structural integrity, further supporting the case for a single means of egress in low to mid-rise buildings.

In conclusion, updating the National and Ontario Building Codes to allow a single means of egress for multi-residential buildings up to six stories is a necessary and forward-thinking adjustment. It recognizes the distinct needs of missing middle housing, supports more efficient use of urban land and aligns regulatory frameworks with modern safety technologies. CLIP Homes is committed to fostering diverse attainable housing options, and we believe these code changes are crucial for enabling the development of vibrant, inclusive communities across the country.

A huge thank you to the Planning and Housing Committee, Fire Chief General and Manager, Toronto Fire Services, Chief Building Official, and Executive Director, Toronto Building for your continued work, support, and perspective on this important issue. We look forward collaborating with you on current and upcoming projects.

Kind regards,



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